



Sheppard, Mullin, Richter & Hampton LLP  
30 Rockefeller Plaza  
New York, New York 10112-0015  
212.653.8700 main  
212.653.8701 fax  
www.sheppardmullin.com


Robert S. Friedman  
212.634.3058 direct  
rfriedman@sheppardmullin.com

April 3, 2025

Application GRANTED.  
SO ORDERED.  
4/4/2025

**VIA ECF**

Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312



P. Kevin Castel  
United States District Judge

Re: Multi-State Partnership for Prevention, LLC v. Deloitte Consulting LLP, et al.,  
Case No. 1:24-cv-09013-PKC (S.D.N.Y.)

Dear Judge Castel:

We represent Defendant Deloitte Consulting LLP ("Deloitte") in connection with the above-referenced action, and write jointly with counsel for Plaintiff Multi-State Partnership for Prevention, LLC ("Plaintiff" or "MSPP") to request that the Court approve the below schedule for the parties' respective pre-motion letters in connection with Deloitte's proposed motion to dismiss MSPP's Second Amended Complaint (ECF Doc. No. 30, the "SAC"). Pursuant to Section 1.A.iii of Your Honor's Individual Practices, the date of the next conference before the Court in this matter is the initial pretrial conference on May 16, 2025.

Deloitte intends to file its pre-motion letter for its proposed motion under Fed. R. Civ. P. 12(b)(6) on or before **April 11, 2025**, the deadline under Fed. R. Civ. P. 15(a)(3). The parties further agree that MSPP shall respond to Deloitte's pre-motion letter by **May 1, 2025**.

Should it be convenient for the Court, the parties are amenable to addressing these letters at the initial pretrial conference scheduled for May 16, 2025.



Hon. P. Kevin Castel  
April 3, 2025  
Page 2

Respectfully,

/s/ Robert S. Friedman  
Robert S. Friedman  
SHEPPARD, MULLIN, RICHTER  
& HAMPTON LLP  
30 Rockefeller Plaza  
New York, New York 10112-0015  
(212) 634-3058  
rfriedman@sheppardmullin.com

*Counsel for Defendant  
Deloitte Consulting LLP*

/s/ Howard A. Newman<sup>1</sup>  
Howard A. Newman  
*Admitted Pro Hac Vice*

1717 K Street, NW; Suite 900  
Washington, DC 20006  
(202) 544-8040  
howard@newmanlawoffices.com

*Counsel for Plaintiff  
Multi-State Partnership for Prevention, LLC*

cc: All Counsel of Record

---

<sup>1</sup> Signature applied and submitted with the express written consent of Mr. Newman, counsel for Plaintiff.